

MISSOURI DEPARTMENT OF MENTAL HEALTH

KEITH SCHAFER, DEPARTMENT DIRECTOR



DEPARTMENT
OPERATING
REGULATION
NUMBER

DOR
8.380

CHAPTER Regulatory Compliance	SUBCHAPTER HIPAA Regulations	EFFECTIVE DATE July 1, 2008	NUMBER OF PAGES 3	PAGE NUMBER 1
Subject Workstation Use and Security		AUTHORITY 630.050 RSMo		History – see below
PERSON RESPONSIBLE Director of Information Systems			SUNSET DATE July 1, 2011	

Purpose: In compliance with 45 CFR 164.310(b), to implement policies and procedures regarding physical safeguards for all workstations that access E-PHI, and to restrict access to authorized users.

Application: Applies to Department of Mental Health, its facilities and workforce

(1) Contents

- (A) Definitions
- (B) Policies
- (C) Procedures
- (D) DOR Control
- (E) Sanctions
- (F) Review Process

(2) Definitions

(A) Workstation – an electronic computing device, for example, a laptop or desktop computer, or any other device that performs similar functions, and the electronic media in its immediate environment.

(B) Electronic Protected Health Information (E-PHI) — individually identifiable health information that is transmitted or maintained in electronic media; or transmitted or maintained in any other form or medium.

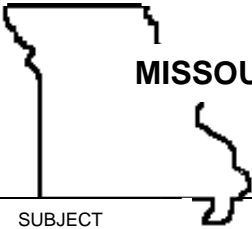
(C) DMH Network – Electronic network allowing access to the DMH's personal computers, facility-based systems, and centrally-based systems (e.g. AS/400, Windows 2000 Server, Mainframe, etc.) and electronic data.

(D) Authorized Users – Employees who have been given user accounts and defined permissions for DMH Network and local computing resources as outlined in DOR 8.300.

(E) DMH Workforce – Includes employees, volunteers, contract workers, trainees and other persons who are in a DMH facility or Central Office on a regular course of business. This shall include client workers employed by the DMH or any of its facilities.

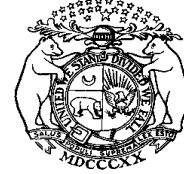
(F) Local Security Officer (LSO) – individual designated by a facility CEO to oversee facility information and physical security practice and policy compliance and to coordinate those activities with the Chief Security Officer.

(G) Chief Security Officer (CSO) – individual designated by the DMH to oversee all activities related to the development, implementation, maintenance of, and



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adherence to Department and facility policies and procedures covering the electronic and physical security of, and access to, protected health information and other DMH data in compliance with federal and state laws and regulations.

(3) Policies

(A) Workforce members shall use workstations in an appropriate manner as to consider the sensitivity of the information contained therein and minimize the possibility of unauthorized access to such information.

(B) Physical safeguards shall be implemented for all workstations that access electronic protected health information, to restrict access to only authorized users.

(C) All persons who engage in use of workstations shall be trained on the proper functions to be performed and the manner in which those functions are to be performed, in accordance with the policies and procedures herein.

(4). Procedures

(A) Limiting Access to Computing Resources – User accounts shall be set up by the Central Office Security Access Group or the LSO as appropriate, to give limited, pre-defined access to the DMH Network and local computing resources outlined in DOR 8.300.

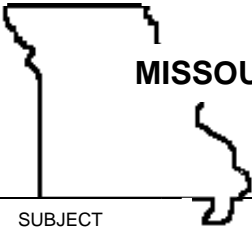
(B) Layout Design and Physical Barriers - Where practical, workstations with access to PHI shall be positioned such that the monitor screens are not visible from the doorway(s), hallway, or public walkways (account for windows near public walkways). In addition, when a person walks into the office/cubicle obtaining a view of the monitor, it is the user's responsibility to minimize any screens containing e-PHI to further guard against incidental disclosure.

(C) Privacy Screens – The CSO or LSO as appropriate, shall determine if a privacy screen/ monitor cover shall be used to restrict the visibility of the information displayed if the requirement noted in 4 (B) cannot be practically achieved.

(D) Workstation Lock – Workstation shall automatically “lock” after 15 minutes of inactivity. Staff shall lock their workstation whenever they leave their computer unattended by pressing CTRL+ALT+DLT and click on “Lock Computer”. This action makes the workstation inaccessible to anyone but the user who is logged on or a DMH Domain Administrator.

(5) DOR Control - There shall be no facility policies pertaining to this topic. The Department Operating Regulations shall control.

(6) Sanctions. Failure of workforce members to comply or ensure compliance with the DOR may result in disciplinary action, up to and including dismissal.



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(7) Review Process. The Chief Security Officer may collect information during the month of April each year beginning in 2006 for the purpose of providing feedback to the Director, Office of Information Systems and to the Executive Team regarding trends and issues associated with compliance with this regulation.

History: Original DOR effective May 1, 2005. On July 1, 2008 the sunset date was extended to July 1, 2011. Amendment effective July 1, 2008.